

**UNITED STATES BANKRUPTCY COURT
District of Massachusetts**

In re Timothy C. Buckley
Debtor

Chapter 13 Case No.: 21-10719

MOTION TO EXTEND DEADLINE TO FILE CERTAIN DOCUMENTS

NOW COMES the Debtor, through counsel, and respectfully submits his Motion to Extend the Deadline to File Schedules A/B-J; Summary of Assets and Liabilities; Chapter 13 Statement of Current Monthly Income and Calculation Commitment Period; and Chapter 13 Plan. In support of said motion Debtor states as follows:

1. The Debtor filed a Chapter 13 Petition on May 17, 2021.
2. The Debtor's liabilities primarily consist of a mortgage secured to his primary residence as well as arrears for real estate taxes and escrow items.
3. The Debtor is awaiting information as to his secured loan cure amounts in order to complete his calculation of commitment period and proposed Chapter 13 Plan.
4. Additionally, the Debtor needs to review the Schedules before he signs the verified declaration and he has been unable to do this due to illness and schedule conflicts.
5. The Debtor respectfully requests a thirty (30) day extension to gather information required as well as meet with counsel to review the Schedules A/B-J.
6. No party would be prejudiced by the allowance of this motion.

WHEREFORE, the Debtor respectfully requests that this Honorable Court allow this Motion to Extend the Deadline to File Documents to July 1, 2021.

Respectfully submitted,

Date: 5/28/2021

/s/Christopher J. Fein
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CERTIFICATE OF SERVICE

I, Christopher J. Fein, counsel for the Debtor Timothy C. Buckley, hereby certify that I served all parties and/or their counsel with a copy of the Debtor's Motion to Extend Deadlines to File Certain Documents along with a copy of the redacted documents to the registered participants in the ECF system as indicated on the filing receipt or via first class mail, postage prepaid on this 28th day of May 2021. Service was made to the following:

Carolyn Bankowski, Chapter 13 Trustee via ECF

Joshua Niman, Esq.
Demerle Hoeger LLP
10 City Square, 4th Floor
Boston, MA 02129

U.S. Bank Trust National Association, Trustee
Lodge Series III Trust
c/o Tracy E. Hoeger, Esq.
10 City Square, 4th Floor
Boston, MA 02129

Silvana K. Buckley
208 Samoset Avenue
Quincy, Massachusetts 02169

City of Quincy
Tax Assessor
1305 Hancock Street
Quincy, MA 02169

SN Servicing Corporation
323 Fifth Street
Eureka, CA 95501

Fiserv Lending Corporation
27 Inwood Road
Rocky Hill, CT 06067

Bank of America, NA
100 North Tryon Street
Charlotte, NC 28255

Synchrony Bank
c/o PRA Receivables management LLC
Box 41021
Norfolk, VA 23541

Respectfully submitted,

Date: 5/28/2021

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